

I am writing in support of the ARRL opposition to the implementation of broadband over power lines (BPL) with field strengths greater than that currently allowed under Part 15 in the 2 to 80 MHz region of the spectrum. I do not see the need for yet another source of high speed data access to consumers. There are currently cable companies, multiple DSL providers, and satellite services that are available to the consumer. As an amateur operator for 35 years and an engineer who designs public safety communication systems for 25, I am appalled by the lack of study that has taken place before its proponents have declared that this technology will not create interference to other services.

This is the same industry that argued that the allocation of a low power sliver of spectrum to the Amateur Service at 137 kHz, where amateur antennas are very inefficient, posed a serious threat to their network control carrier systems because the transmission lines would act as antennas that could receive interference from operators in the Amateur Service. They argued that this could result in damage the power grid. Now they argue that at HF and Low VHF frequencies their network will not operate efficiently as an antenna and cause interference to other services who are using efficient antennas.

Not only does BPL have the potential to wipe out HF amateur operation, but it also will potentially destroy the usefulness of the Military Affiliate Radio System (MARS) which operates in spectrum adjacent to HF amateur bands.

An even greater threat is the potential of BPL to interfere with the public safety and public service operations in the low VHF band from 30 and 50 MHz which still exist in many areas of the country. The current concern about the security of the United States makes it hard to believe that a consumer service would be seriously considered that has the potential to compromise public safety communications.

It is possible to operate around the many Part 15 devices that currently plague the amateur HF bands. At least they typically only make a few kHz at a time of spectrum useless and in a local area. BPL has the potential to make the HF spectrum a vast wasteland, even at the current Part 15 levels that it could be allowed to operate at today.

The Commission should not allow the operation of BPL at field strengths higher than today's Part 15 restrictions. Indeed, current Part 15 restrictions should be strengthened to limit the radiation permitted broadband devices to levels significantly below those currently permitted by Part 15 between 500 kHz and 54 MHz.

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